

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

<b>ALISHA W. WILKES,</b>	:	
	:	
<b>Plaintiff</b>	:	
<b>v.</b>	:	<b>Civ. No. 1:10cv1160</b>
	:	
<b>EXPERIAN INFORMATION SOLUTIONS, INC.,</b>	:	
<b>et al.</b>	:	
<b>Defendants.</b>	:	

**PLAINTIFF’S MOTION  
FOR RULE 37(c)(1) SANCTIONS**

Comes now the Plaintiff Alicia Wilkes, by counsel, and moves the court for Rule 37(c)(1) sanctions against GMAC Mortgage, LLC, for failure to comply with discovery. For the reasons stated in the accompanying Memorandum in Support, Plaintiff respectfully requests the Court exclude from Defendant’s use at trial

- (1) The testimony or any evidence related to GMAC employees Heather Meinecke, Lynnette Manning, Amy Fleitas;
- (2) The testimony or any evidence related to Christopher Nolan;
- (3) Any new testimony and opinions proffered by Oscar Marquis, GMAC’s “expert” witness in his second Rule 26(a)(2) report.

Respectfully Submitted,

ALISHA WILKES,

\_\_\_\_\_  
/s/  
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Attorney for Plaintiff

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 17<sup>th</sup> day of June, 2011, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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